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January 12, 2005

VIA UPS NEXT DAY AIR

Dr. Robert Moore
Office of Nutritional Products,
Labeling and Dietary Supplements (HFS-811)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Pkwy.
College Park, MD 20740

JAN 24 2005

***Re: Fulfillment of Reporting Obligation
Under 21 U.S.C. § 343(r) and 21 C.F.R. § 101.93***

Dear Dr. Moore:

Imagenetix, Inc.,¹ by counsel and in accordance with 21 U.S.C. § 343(r) and 21 C.F.R. § 101.93, hereby submits an original and two copies of its notification within thirty days of first marketing its products with the statements presented below. Imagenetix, Inc. retains scientific documentation supporting the statements.

1. **Supplement Brand Name**

Celadrin

2. **Ingredients**

Cetylated fatty acids

3. **Text of Statements of Nutritional Support**

- Cetylated fatty acids support comfortable joint movement.
- Cetylated fatty acids promote comfortable joint movement.
- Cetylated fatty acids promote joint flexibility.

¹ The address for Imagenetix, Inc. is 16935 W. Bernardo Drive Suite 101, San Diego, CA 92127.

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- Cetylated fatty acids support the maintenance of joint flexibility.
- Cetylated fatty acids provide support for healthy joint function.
- Cetylated fatty acids support the lubrication of joints.
- Cetylated fatty acids promote joint lubrication.
- Cetylated fatty acids provide support for maintaining the cushioning properties of joints.
- Cetylated fatty acids provide support for joint mobility.
- Cetylated fatty acids support joint mobility.
- Cetylated fatty acids improve the quality of life by promoting joint health.
- Cetylated fatty acids support joint health.
- Cetylated fatty acids promote joint health.
- Cetylated fatty acids help maintain healthy joints.

In accordance with 21 U.S.C. § 343(r)(6) and 21 C.F.R. § 101.93(c), each of the above statements will be followed by an asterisk that will be cross-referenced to another asterisk on the very same panel or page next to which the following statement will appear in a box in bold face type: **"This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease."**

Respectfully submitted,



Jonathan W. Emord
Claudia A. Lewis-Eng

cc: Bill Spencer
Patrick Milsap

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858-674-8460

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Certification

I, William Spencer, President of Imagenetix, Inc., hereby certify that the information contained in the foregoing notice is complete and accurate and that Imagenetix has substantiation that the statements are truthful and not misleading.

Executed on: 1-05-05



William Spencer